

14<sup>th</sup> November 2019

Kind Attention:

Honourable Judge Robert D.Drain  
U.S Bankruptcy Court  
Southern District of New York

**FILED**  
**U.S. BANKRUPTCY COURT**

2019 NOV 14 P 2: 04

S.D. OF N.Y.

Debtor: Retrieval-Masters Creditors Bureau, Inc.

Case Number: 19-23185-rdd

**Subject : Application for Administrative Claim**

Respected Sir,

We are herewith filing an application for claim of post-petition charges that are due from above mentioned debtor.

The charges for post-petition activity of \$80,000 were agreed by Mr.Russell Fuchs, owner CEO of the Debtor, Mr.Jeff Wollman their CFO & COO under knowledge of their attorney Mr.Steven Wilamowsky.

We have completed the activity for which these charges were agreed to, subsequently we have only received \$68,750 from the debtor leaving unpaid charges of \$11,250.

For your ready reference please find attached:

- 1) Email chain of agreement between the concerned parties
- 2) Proof of activity completion
- 3) Administrative Claim Working: Reflecting statement of payments received & outstanding balance.

We are hereby requesting for acceptance of this application and an order approving this claim.

I am also requesting your honourable office that if any hearing needs to take place for this matter, it should be considered to conduct the same on telephone as I am based in Mumbai, India.

I humbly request your prompt attention in this matter.

Yours Sincerely,

**For ExpertSource Global Services Private Limited**



**Anil Wadhwa**  
CEO

Address: Unit 102, Deekay Tech Park, TTC Industrial Area,  
MIDC, Turbhe, Navi Mumbai, Maharashtra, INDIA. 400705

Email: [Anil@expertsources.com](mailto:Anil@expertsources.com)

Mobile: +91 750 640 4224 Office: +1 347.899.4250

## ACCOUNTS

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**From:** Anil Wadhwa [anil@expertsourcesource.com]  
**Sent:** Thursday, October 31, 2019 2:05 AM  
**To:** 'ACCOUNTS'  
**Subject:** FW: RE: Make PDF

**From:** Anil Wadhwa [mailto:anil@expertsourcesource.com]  
**Sent:** Friday, June 21, 2019 2:14 AM  
**To:** 'Russ Fuchs'  
**Cc:** 'Jeff Wollman'; 'wilamowsky@chapman.com'  
**Subject:** RE: RE:

OK. Accepting your original offer of \$35000 this week and \$45000 over next 4 weeks.

Anil Wadhwa

**From:** Russ Fuchs [mailto:tkrf@aol.com]  
**Sent:** Friday, June 21, 2019 2:12 AM  
**To:** Anil Wadhwa  
**Cc:** Jeff Wollman; wilamowsky@chapman.com  
**Subject:** Re: RE:

Cannot Anil.

Russ

On Jun 20, 2019, at 4:37 PM, Anil Wadhwa <[anil@expertsourcesource.com](mailto:anil@expertsourcesource.com)> wrote:

Jeff,

We are in agreement in principle. Request you to try and increase some amount for this week to say around \$45000 and future weeks payments can be reduced to \$35000.

Anyways expecting this week's wire by tomorrow.

Anil Wadhwa

**From:** Jeff Wollman [mailto:jwollman@retrievalmasters.com]  
**Sent:** Thursday, June 20, 2019 9:45 PM  
**To:** Anil Wadhwa; Russell Fuchs AOL  
**Cc:** wilamowsky@chapman.com  
**Subject:** Re:

Anil,

Russ is in his car however I conveyed the information you wrote in your last text to me. As of now our offer below still stands but we cannot deviate from it.

Sincerely,

<image001.gif>

Jeffrey S Wollman  
Chief Financial Officer  
Retrieval-Masters Creditors Bureau, Inc.  
American Medical Collection Agency  
4 Westchester Plaza, Suite 110 (Overnight Mail)  
PO Box 160 (Regular Mail)  
Elmsford, NY 10523  
914 721-8666 (Direct)  
800 666-8097 (Office)  
914 345-7134 (Fax)  
914 772-2298 (Mobile)

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**From:** Anil Wadhwa <[anil@expertsources.com](mailto:anil@expertsources.com)>  
**Date:** Thursday, June 20, 2019 at 11:17 AM  
**To:** Russell Fuchs <[tkrf@aol.com](mailto:tkrf@aol.com)>  
**Cc:** Jeffrey Wollman <[jwollman@retrievalmasters.com](mailto:jwollman@retrievalmasters.com)>, Steven Wilamowsky <[wilamowsky@chapman.com](mailto:wilamowsky@chapman.com)>  
**Subject:** RE: RE:

In that case I am afraid we will be at a dead end, with more troubles to pile up.

Anil Wadhwa

**From:** Russ Fuchs [<mailto:tkrf@aol.com>]  
**Sent:** Thursday, June 20, 2019 8:18 PM  
**To:** Anil Wadhwa  
**Cc:** [jwollman@retrievalmasters.com](mailto:jwollman@retrievalmasters.com); [wilamowsky@chapman.com](mailto:wilamowsky@chapman.com)  
**Subject:** Re: RE:

Sorry Anil.

I don't have it.

Russ

On Jun 20, 2019, at 10:33 AM, Anil Wadhwa <[anil@expertsources.com](mailto:anil@expertsources.com)> wrote:

Russell,

I am willing to accept the budget cut to \$2000 for next 4 weeks and guarantee you we will staff the lines if you pay us as per below schedule. Here is the proposal –

- |  |          |
|--|----------|
| 1. Charges Billed to you up until 13 <sup>th</sup> June: | \$80,000 |
| 2. This week expected billing:                           | \$12,000 |
| 3. Next 4 weeks (4 x 2000):                              | \$ 8000  |

4. Total: \$100,000

We need to receive minimum \$50,000 from you this week. And remaining \$50,000 in next 4 weeks \$12500 each week. I am not negotiating here but only asking for money to survive.

Anil Wadhwa

**From:** [tkrf@aol.com](mailto:tkrf@aol.com) [<mailto:tkrf@aol.com>]  
**Sent:** Thursday, June 20, 2019 7:40 PM  
**To:** [anil@expertsource.com](mailto:anil@expertsource.com); [jwollman@retrievalmasters.com](mailto:jwollman@retrievalmasters.com); [wilamowsky@chapman.com](mailto:wilamowsky@chapman.com)  
**Subject:** re:

Trying to see if we can do something, but if you are not willing to budge from what is the most I can do, there won't be anything to talk about..

I don't agree with your 30,000 deficiency from our prior collection programs. So it's not on the table.

You have incurred \$50,000 in costs that were not necessary for the inbound from notices.

You can cut your staff to @ \$2,000 per week for the next 4 weeks.

I am willing to give you 35,000. this week and then the remaining 45,000 over the next 4 weeks as long as you operate.

I won't negotiate any further.

Russ

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Disclaimer: The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

4 Week Activity Details as Below

Date	Day	FTE	Calls Offered	Calls Answered	Answered Level %	Average Speed to Answer	Abandoned In Queue	Abandoned Before Call Queue	Abandoned Level %	Net Login Hrs	Handle Time	AHT
24-Jun	Mon	10	486	473	97.33%	0:00:08	7	6	1.46%	79:47:24	28:26:01	0:03:36
25-Jun	Tue	7	353	339	96.03%	0:00:08	11	3	3.14%	56:17:16	19:28:39	0:03:27
26-Jun	Wed	6	287	277	96.52%	0:00:13	7	3	2.46%	43:15:44	15:46:43	0:03:25
27-Jun	Thu	6	233	224	96.14%	0:00:09	8	1	3.45%	48:09:41	12:59:56	0:03:29
28-Jun	Fri	6	184	182	98.91%	0:00:08	1	1	0.55%	45:19:44	9:59:10	0:03:18
<b>Week 1</b>		<b>7</b>	<b>1543</b>	<b>1495</b>	<b>96.89%</b>	<b>0:00:09</b>	<b>34</b>	<b>14</b>	<b>2.22%</b>	<b>272:49:49</b>	<b>86:40:29</b>	<b>0:03:29</b>
1-Jul	Mon	5	234	226	96.58%	0:00:16	6	2	2.59%	40:01:13	12:43:08	0:03:23
2-Jul	Tue	4	160	152	95.00%	0:00:08	7	1	4.40%	32:59:20	6:17:32	0:02:29
3-Jul	Wed	4	131	126	96.18%	0:00:19	5	0	3.82%	40:17:44	6:04:14	0:02:53
4-Jul	Thu											
5-Jul	Fri	4	113	110	97.35%	0:00:07	2	1	1.79%	39:32:43	7:27:35	0:04:04
<b>Week 2</b>		<b>4</b>	<b>638</b>	<b>614</b>	<b>96.24%</b>	<b>0:00:12</b>	<b>20</b>	<b>4</b>	<b>3.15%</b>	<b>152:51:00</b>	<b>32:32:29</b>	<b>0:03:11</b>
8-Jul	Mon	2	138	131	94.93%	0:00:33	6	1	4.38%	17:00:28	7:34:31	0:03:28
9-Jul	Tue	2	124	118	95.16%	0:00:20	5	1	4.07%	17:39:03	6:13:44	0:03:10
10-Jul	Wed	2	75	75	100.00%	0:00:18	0	0	0.00%	16:13:53	3:32:54	0:02:50
11-Jul	Thu	2	88	82	93.18%	0:00:15	5	1	5.75%	14:46:13	3:03:11	0:02:14
12-Jul	Fri	2	78	71	91.03%	0:00:13	6	1	7.79%	17:58:43	3:55:15	0:03:19
<b>Week 3</b>		<b>2</b>	<b>503</b>	<b>477</b>	<b>94.83%</b>	<b>0:00:20</b>	<b>22</b>	<b>4</b>	<b>4.41%</b>	<b>83:38:20</b>	<b>24:19:35</b>	<b>0:03:04</b>
15-Jul	Mon	2	92	92	100.00%	0:00:12	0	0	0.00%	18:22:15	5:04:20	0:03:18
16-Jul	Tue	2	87	79	90.80%	0:00:55	8	0	9.20%	15:23:59	4:01:46	0:03:04
17-Jul	Wed	2	53	52	98.11%	0:00:07	0	1	0.00%	17:23:38	2:09:12	0:02:29
18-Jul	Thu	2	124	117	94.35%	0:00:26	5	2	4.10%	18:11:38	6:57:42	0:03:34
19-Jul	Fri	2	136	125	91.91%	0:00:19	9	2	6.72%	18:05:27	6:40:17	0:03:12
<b>Week 4</b>		<b>2</b>	<b>492</b>	<b>465</b>	<b>94.51%</b>	<b>0:00:24</b>	<b>22</b>	<b>5</b>	<b>4.52%</b>	<b>69:15:19</b>	<b>24:53:17</b>	<b>0:03:13</b>

US Holiday

**Administrative Expenses Claim working under 11 U.S.C 503.**

<b>Particulers</b>	<b>Amount (\$)</b>
Agreed Offer amount	\$80,000.00
<b>Total Receivable (A)</b>	<b>\$80,000.00</b>
<b>Payments receipt details of above offer amount</b>	
<b>Payment Receipt date</b>	<b>Payment receipt Amount</b>
24.06.2019	\$35,000.00
01.07.2019	\$11,250.00
04.07.2019	\$11,250.00
15.07.2019	\$11,250.00
<b>Total Receipt (B)</b>	<b>\$68,750.00</b>
<b>Balance amount receivable (A-B)</b>	<b>\$11,250.00</b>